

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

BRADLEY ERHART,	)	Case No. 1:21-cv-1829-TWP-TAB
Plaintiff	)	
v.	)	
NANCY ERHART,	)	
Defendant.	)	

**DEFENDANT'S PRELIMINARY WITNESS AND EXHIBIT LIST**

Defendant Nancy Erhart states the following witnesses and exhibits may be called or introduced at trial:

**Preliminary Witness List**

1. Bradley Erhart
2. Nancy Elizabeth Erhart
3. Sarah Erhart
4. Any witnesses necessary to evaluate the actions taken by Nancy Erhart in the administration of the Trust.
5. Any witnesses necessary to testify regarding the location or quantity of assets of the Trust.
6. Any witnesses necessary to authenticate documents.
7. Any witnesses necessary for purposes of rebuttal or impeachment.
8. Any disclosed expert witnesses.
9. Any witnesses identified by other parties in this action.
10. Nancy Erhart reserves the right to amend this Preliminary Witness List as discovery and investigation continues or as additional information

becomes available.

**Preliminary Exhibit List**

1. The Estate Planning Documents of Mary E. Catron, including the Mary E. Catron Living Trust, dated February 2001, and any notes and/or correspondence pertaining to such Estate Planning Documents.
2. All financial records in the possession of Star Financial Bank regarding the assets of the Trust.
3. All other documents and communications regarding or evidencing the assets of the Trust.
4. All documents and communications regarding the administration of the Trust, including the disbursement of assets.
5. All documents evidencing the value of Trust Assets, including the value of the farm land.
6. All communications between Nancy Erhart and others regarding the Trust, or the administration of the Trust.
7. All items identified in any depositions taken or to be taken in this action.
8. Any report prepared by an expert witness.
9. Demonstrative exhibits and summaries.
10. Rebuttal or impeachment exhibits.
11. All or certain discovery produced by any party to this action.

Nancy Erhart reserves the right to amend this Preliminary Exhibit List as

discovery and investigation continues or as additional information

Dated: February 11, 2022

Respectfully submitted,

/s/ Phillip C. Smith

Phillip C. Smith Attorney No. 21830-84  
2901 Ohio Boulevard, Suite 124  
Terre Haute, IN 47803  
(812) 244-0761  
[Phillip.Smith@WabashValleyLawyer.com](mailto:Phillip.Smith@WabashValleyLawyer.com)

**CERTIFICATE OF SERVICE**

I, Phillip C. Smith, an attorney, hereby certified that a true and correct copy of the above and foregoing document was electronically filed on February 11, 2022, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties and attorneys of record.

/s/Phillip C. Smith

Phillip C. Smith Atty. No. 21830-84  
Corporate Square  
2901 Ohio Boulevard, Suite 124  
Terre Haute, IN 47803-2239  
(812) 244-0761  
[Phillip.Smith@WabashValleyLawyer.com](mailto:Phillip.Smith@WabashValleyLawyer.com)  
Counsel for Defendant Nancy Erhart